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April 11, 2007

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By Hand Delivery

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

**Re: AccessLine Communications Corporation
911 Compliance Status Report
WC Docket No. 05-196**

Dear Ms. Dortch:

AccessLine Communications Corporation ("ACC"), by its counsel, hereby submits this report in response to the FCC letter dated March 12, 2007, requesting that ACC provide additional information regarding its compliance with the FCC's 911 regulations. *See* Letter to Mark Klebanoff from Kathryn Berthot (March 12, 2007) (hereafter "Inquiry Letter"). As noted in ACC's November 28, 2005 Compliance Letter, ACC has contracted with Intrado to provide VoIP subscribers a nationwide 911 solution in full compliance with the FCC's regulations. *See* Letter to Marlene Dortch from Glenn Richards (November 28, 2005). Based on information provided by Intrado, as of March 27, 2007, Intrado has deployed a 911 solution in full compliance with the FCC's rules to 4,561 PSAPs in the U.S. Intrado is actively working to expand coverage to additional PSAPs. Attached as Exhibit A is a map of Intrado's nationwide 911 network capabilities and projected deployment schedule. Attached as Exhibit B is a map showing delays in deployment Intrado is experiencing with certain PSAPs. Attached as Exhibit C is a PSAP deployment spreadsheet highlighting the specific PSAPs that have been deployed by Intrado, and for those that have not been deployed it lists the target dates and the specific reason for delay. Attached as Exhibit D is an explanation provided by Intrado for the PSAP categories used in Exhibit C.

ACC's responses to the FCC's specific inquiries are as follows:

Provision of Compliant 911 Service: Approximately 95.4% of ACC's VoIP subscribers receive 911 service in full compliance with the FCC's rules. Attached as Exhibit E is a chart summarizing Intrado's 911 network capabilities as applied to ACC's VoIP subscribers.

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911 Coverage: As shown in Exhibit E, 4.6% of ACC's subscribers are in areas of the country in which Intrado has not yet deployed an FCC-compliant 911 solution. Exhibit C provides a detailed list of all PSAPs for which Intrado has not yet deployed an FCC-compliant 911 solution, and indicates, if available, the scheduled date for deployment. ACC does not accept new VoIP customers in areas where it is not possible to provide 911 service in compliance with the FCC rules. As Intrado deploys FCC-compliant 911 service to new PSAPs, ACC will accept new VoIP customers in those areas.

911 Routing Information/Connectivity to Wireline E911 Network: ACC is capable of transmitting 911 calls for 95.4% of its VoIP subscribers to the appropriate PSAP, designated statewide default answering point, or appropriate local emergency authority utilizing the selective router, the trunk line(s) between the selective router and the PSAP, and such other elements of the wireline E911 network as are necessary in those areas where selective routers are utilized. See attached Exhibit E. For 4.6% of ACC's VoIP subscribers, Intrado has identified the corresponding PSAPs as having wireline E911 network capability, however Intrado has not yet interconnected with the wireline E911 network, and in these cases ACC (through Intrado) routes VoIP 911 calls via the PSTN to the PSAP's emergency administrative line. Exhibit C provides further detail on Intrado's schedule for PSAPs that are not yet deployed.

New VoIP Customers and/or Marketing of VoIP Service in Non-Compliant Areas: As mentioned above, ACC does not accept new VoIP customers in areas where it is not possible to provide 911 service in compliance with the FCC rules. ACC currently serves [REDACTED] subscribers in areas where Intrado has not yet deployed a 911 network solution that is fully compliant with the FCC's regulations (see Exhibit E), and of those, all were provisioned with new service after November 28, 2005. ACC has procedures in place to ensure that no new subscribers are being provisioned in non-compliant areas.

Respectfully submitted,

Glenn S. Richards
 Tony Lin
Counsel for AccessLine Communications Corporation

Attachments

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cc: (w/attachments)
Kathy Berthot
Carol Simpson
Best Copy and Printing, Inc.